

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN F. VODOPIA,) CASE NO. 1:07CV06214
)
Plaintiff,) JUDGE BARBARA S. JONES
)
) MAGISTRATE JUDGE DEBRA C. FREEMAN
vs.)
)
)
KONINKLIJKE PHILIPS ELECTRONICS)
N.V., *et al.*,)
)
Defendants.)

PROPOSED ORDER TO PREVENT DISSEMINATION AND DISCLOSURE OF
PHILIPS ELECTRONICS NORTH AMERICA CORPORATION'S AND
KONINKLIJKE PHILIPS ELECTRONICS N.V.'S CONFIDENTIAL,
PROPRIETARY, AND/OR ATTORNEY-CLIENT PRIVILEGED
INFORMATION BY PLAINTIFF AND TO PREVENT SPOILATION OF
EVIDENCE BY PLAINTIFF

The Court, having considered Philips Electronics North America Corporation's Motion to Prevent Dissemination and Disclosure of Philips Electronics North America Corporation's and Koninklijke Philips Electronics N.V.'s Confidential, Proprietary, and/or Attorney-Client Privileged Information by Plaintiff and the Memorandum in Support of such Motion and any opposition papers that may have been filed, hereby finds and concludes that Defendant Philips Electronics North America Corporation's Motion is well taken. Accordingly, the Court orders the following:

1. Plaintiff is hereby prohibited from disclosing, publishing, or disseminating to others the Complaint or any other privileged or confidential documents or information concerning Defendant Koninklijke Philips Electronics N.V. ("Koninklijke") or Defendant Philips Electronics North America Corporation ("Philips").

2. Plaintiff, as well as his attorneys and agents, are hereby ordered to return to Defendants' counsel (by no later than October 31, 2007) all materials and documents (including all copies and all electronic versions of said documents) relating to Defendants obtained by Plaintiff in connection with his employment or otherwise.

3. Plaintiff, as well as his attorneys and agents, are hereby ordered to return to Defendants' counsel (by no later than October 31, 2007) or shall destroy (and, in such case, shall certify destruction to the Court) any summaries, abstracts, or notes, memoranda, or other documents relating to Philips' attorney-client privileged or confidential documents or matters.

4. Plaintiff shall certify to the Court and to Defendants (by no later than October 31, 2007) the identity of any person or entity to whom he has previously provided or shown any confidential and/or privileged materials relating to Defendants.

5. Plaintiff shall certify to the Court (by no later than October 31, 2007) that he has conducted a complete search for Defendants' documents and property in his actual or constructive possession.

So ordered.

District Judge

5232642.1 (OGLETREE)